

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
NORTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 22-10044

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

DANA AMAN,

Defendant.

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The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense(s) to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3).

Beginning on a date unknown but no later than on or about January 1, 2020, and continuing through March 2021, in the District of South Dakota and elsewhere, the defendant, Dana Aman, knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and to possess with the intent to distribute Tapentadol, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(C), and 18 U.S.C. § 3237.

On November 10, 2020, Postal Inspectors in South Dakota were notified of one international package that was intercepted by CBP on November 9, 2020, in Memphis, TN. The package originated in Navi Mumbai, India, and was addressed to Cass Clay Creamery D Aman with a Mobridge, South Dakota

address. The parcel was found to contain fifty boxes of silver blister packs that contained orange pills. The boxes and blister packs were labeled "Tapentadol Tablets 100 mg." Each blister pack contained 10 tablets, and each box contained 10 blister packs for a total of 5,000 tablets in the package. A search warrant was executed at Aman's residence and thousands of additional pills and firearms were located.

The Defendant received the pills from his source and then would repackage and mail the pills to various individuals across the country. It was reasonably foreseeable to the Defendant that Tapentadol would be distributed during the course of the conspiracy. Tapentadol is a Schedule II controlled substance.

The Defendant admits that he is a regular user of controlled substances that he does not possess a valid prescription for. The Defendant admits a firearm was possessed in connection with the drug conspiracy. *Tapentadol* *AK*

The parties submit that the foregoing statement of facts is not intended to be a complete description of the offense or the Defendant's involvement in it. Instead, the statement is offered for the limited purpose of satisfying the requirements of Fed. R. Crim. P. 11(b)(3). The parties understand that additional information relevant to sentencing, including additional drug quantities, may be developed and attributed to the Defendant for sentencing purposes.

ALISON J. RAMSDELL  
United States Attorney

4-17-23  
Date

MN Dilges  
Meghan N. Dilges  
Assistant United States Attorney  
P.O. Box 7240  
Pierre, SD 57501  
Telephone: (605)224-5402  
Facsimile: (605)224-8305  
E-Mail: Meghan.Dilges@usdoj.gov

04-21-23  
Date

D. Aman  
Dana Aman  
Defendant

4-21-23  
Date

Amanda Work  
Amanda Work  
Attorney for Defendant